

**IN THE UNITED STATES BANKRUPTCY COURT  
 WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	)	
JAMIE VICTOR EDWARDS	)	
	)	Bankruptcy No. 21-70434-JAD
Debtor	)	
	)	Chapter 7
FORD MOTOR CREDIT COMPANY LLC	)	
	)	Hearing Date & Time 1/4/2022 10:00 A.M.
Movant	)	
	)	
v.	)	
JAMIE VICTOR EDWARDS, DEBTOR	)	
ERIC E. BONONI, TRUSTEE	)	
Respondents	)	

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND ABANDONMENT  
 AND WAIVER OF 14-DAY STAY UNDER FED. BANKR. RULE 4001(a)(3)**

Now comes, Ford Motor Credit Company LLC by and through counsel, Garry Masterson and Weltman, Weinberg & Reis, Co., L.P.A. and states the following:

1. That this action is commenced pursuant to 11 U.S.C. §§ 361, 362, 363, 554(b) and other Sections of Title 11 of the Bankruptcy Code.
2. That the Debtors filed their voluntary petition under Chapter 7 of the Bankruptcy code on 11/15/2021.
3. That on 4/27/2020, the Debtors herein did execute and deliver to the Movant a certain Retail Installment Contract in the amount of \$45,870.48, attached hereto as Exhibit A.
4. That incorporated in the Retail Installment Contract referenced in Paragraph Three (3) hereof is a Security Agreement granting to this Movant a security interest in a 2019 Ford F150 VIN#1FTEW1EP5KKF30942.
5. That the security interest referenced in Paragraph Four (4) hereof, was perfected by a notation of the lien upon the Certificate of Title of the vehicle dated on 5/8/2020, attached hereto as Exhibit B.
6. That there remains due and owing on the Retail Installment Contract referenced in Paragraph Three (3) hereof, the sum of \$43,228.53 together with interest at a rate of 11.53 percent per annum from 11/18/2021.
7. That the Debtor is presently in default of his obligation to Movant and there are arrearages of \$4,502.70 as of the date of the filing of this Motion representing the 6/23/2021-10/23/2021 payments of \$889.86each. The Debtor is presently due for the 11/23/2021 payment.

WHEREFORE, Movant prays for an Order from this Court:

1. granting Movant relief from stay and abandonment to recover and liquidate its collateral referenced herein on the personal property referenced herein; and
2. waiving the 14-day stay provided for in Fed, Bankr. Rule 4001(a)(3); and
3. for such other and further relief as equity and/or law entitles Movant to receive.

/s/ Garry Masterson

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